

Exhibit 2

State of New York

ss.

County of New York

I, David McReynolds, being duly sworn, depose and state:

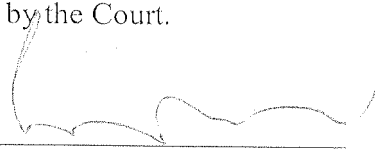
1. I make this affidavit in support of the NYC War Resisters League's (WRL) request that the Court deny the defendants' motion to compel compliance with the subpoenas issued to WRL and Frida Berrigan in the federal litigation arising out of the mass arrests by the New York Police Department (NYPD) during the Republic National Convention (RNC) in August 2004.
2. I provide this affidavit to provide some history regarding the WRL and my experience with retaliation and reprisal for my involvement in the WRL and other political activities.
3. By way of background information, I have been a democratic socialist and pacifist activist for more than fifty years. In the 1950s, I joined the Socialist Party and the WRL. In 1960, I joined the staff of the WRL. I worked at WRL until my retirement in 1999, and I remain active with the group. I have written extensively on nonviolence and on socialism; my published writings include The Philosophy of Nonviolence and The Infinite Series. I have also been active in electoral politics. I ran for Congress twice, and for President twice. In 2004, I ran as the Green Party candidate for the New York seat in the United States Senate.
4. By way of background about the WRL, it is a pacifist, anti-war organization. The WRL membership pledge states: "The War Resisters League affirms that war is a crime against humanity. We are therefore determined not to support any kind of war, international or civil, and to strive nonviolently for the removal of all causes of war."
5. WRL was formed in the United States after World War I by individuals who had opposed the war. During WWII, WRL advocated for peace and against military service. In the 1950s and 1960s, WRL and its members worked actively for civil rights causes and organized protests against nuclear testing. In the 1960s and 1970s, WRL and its members worked to end the war in Vietnam. Today, WRL opposes the wars in Iraq and Afghanistan, as well as militarism in the United States. Throughout WRL's existence, WRL members have been arrested for their participation in WRL-related advocacy.
6. During the more than fifty years of my participation in the WRL, I have often been monitored by government agents. I have obtained and read a copy of my Federal Bureau of Investigation file, which contains more than 400 pages about me.
7. Early in my involvement with the WRL and the Socialist Party, I lost two jobs. I suspect

I lost the first one as a meter reader because of my involvement with the Socialist Party, although I do not have concrete evidence of that. In the 1950s, I lost a job in the photography laboratory of an advertising company in California. When I lost the job, a personnel manager called me and told me that I had done a good job at the company but that the company had received inquiries about me from the FBI and had decided to let me go. I believe that I was monitored by the FBI during that period because of my membership in the Socialist Party and WRL.

8. Losing one's job because of one's peaceful political activities is a high price to pay for one's beliefs. The loss of a job causes significant financial, personal and emotional difficulties for any person, all the more so when it is in retaliation for efforts to improve society and bring about peace. I believe that some WRL members value privacy regarding their membership because they do not want to face the possibility of losing their jobs, and they realize that based on other WRL members' experiences, the loss of their jobs is a possibility.
9. Based on federal government files released to other WRL members, I believe that during the Vietnam War, WRL meetings held on Charles Street in a member's apartment were surreptitiously recorded by the FBI. At some point (I cannot remember the exact date), I reviewed a summary of a meeting held in the Charles Street apartment that had been produced in a government file about a WRL member. As the meeting was small and attended only by very loyal members of WRL, and the summary contained many details, I concluded that the federal government had recorded the conversation and that the apartment, a regular WRL meeting place, had been bugged. In the alternative, which I believe to be unlikely, the FBI had an informant among the members of our group. Under either scenario, the FBI was monitoring WRL's activities.
10. I have also been the subject of surveillance by the New York City Police Department and its Bureau of Special Services, the so-called "red squad", because of my WRL activities and membership in the Socialist Party. I know about the existence of the "red squad" because I spoke with members of the squad in connection with organizing political activities over the years.
11. Sometimes actions taken against WRL have involved violence, an ironic circumstance given the group's goals. In the late 1960s, the WRL office at 5 Beekman was completely destroyed in an overnight attack. Of note, the WRL's files were taken, and our machinery was ruined. The attack had the hallmarks of a "professional job", and did not have the characteristics of a break-in by a common criminal. It was the view of the WRL at the time, and remains my view today, that the attack was probably carried out by the FBI or the CIA.
12. I have read numerous newspaper reports and other articles about suspected and confirmed reports of surveillance of domestic anti-war and peace groups since September 11th. I

have also read that the federal government maintains files on anti-war groups in the United States. From what I have read about these efforts by the government, it is my opinion that the government's current activities are very similar to those which involved me and WRL over the past fifty years, some of which I have mentioned above.

13. I believe that it is reasonable for WRL members to be concerned that they will be subject to surveillance or other investigation by government agencies, and that such targeting will be made easier if their names and their political discussions are released to the New York City defendants or the public in response to these subpoenas.
14. It is also my opinion that the First Amendment protections of political speech and association facilitate the efforts of pacifist groups such as the WRL. If WRL membership lists or records of meetings were to be disclosed, I believe that it would chill some of the speech of some members of the group.
15. I support the WRL's request that it not be forced to turn over its documents and that its members not be required to give testimony about the group's private discussions and membership.
16. I am available to provide additional information if requested by the Court.


David McReynolds

Sworn and subscribed to before me
this 30 day of Oct 2006


Notary Public

Gary Patrick
Notary Public, State of New York
No. 01PA6181693
Qualified in Rockland County
Commission Expires Oct. 15, 2010